

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**Hon. Renee M. Bumb**

**This Document Relates To:**  
*All Actions*

**Civ. No. 19-2875 (RMB/SAK)**

**PLAINTIFFS' AMENDED NOTICE OF VIDEOTAPED DEPOSITION AMIT MODI**

**TO: Alexia Brancato  
Lindsey Foster  
Kirkland & Ellis, LLP  
601 Lexington Avenue,  
New York, NY 10022**

*Counsel for Defendants Torrent Pharmaceuticals LTD  
and Torrent Pharma Inc.*

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped of Amit Modi, General Manager-Supply Chain at Torrent Pharma. The deposition will commence on **Thursday October 10, 2024, at 5:30 A.M. Eastern Standard Time**, and continue until completion, via remote deposition, in accordance with the Fact Witness Deposition Protocol and Case Management Order No. 20, filed on November 17, 2020 (Document 632).

The witness shall produce the documents requested at Exhibit A, attached hereto, at least 3 days in advance of this noticed deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

Paul S. Rothstein  
Law Offices of Paul S. Rothstein, P.A.  
626 NE 1<sup>st</sup> Street  
Gainesville, Florida 32601  
[psr@rothsteinforjustice.com](mailto:psr@rothsteinforjustice.com)

The deposition will be taken before an officer authorized to administer oaths. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

DATED this 4<sup>th</sup> day of October 2024.

**FOR PLAINTIFFS**

/s/ Paul S. Rothstein  
Paul S. Rothstein  
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626 N.E. 1<sup>st</sup> Street  
Gainesville, Fl. 32601  
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Attorney for Plaintiffs

**EXHIBIT A**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Amit Modi.
2. The complete production of Amit Modi's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

**CERTIFICATE OF SERVICE**

I, Stacy Burrows, hereby certify that on October 4, 2024, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on counsel for Torrent Pharmaceuticals Limited and Torrent Pharma Inc., and Defendants' counsel, as listed above, via email.

DATED this 4<sup>th</sup> day of October 2024.

/s/ Stacy A. Burrows

Stacy A. Burrows

Barton and Burrows, LLC

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